



NEW MEXICO
HEALTH AND ENVIRONMENT
DEPARTMENT

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Deputy Secretary

May 20, 1987

Mark Satterwhite, 6H-SS
USEPA
Allied Bank Tower
1445 Ross Ave.
Dallas, TX 75202-2733

90067790



Dear Mark:

Enclosed are completed PA forms for four sites:

Transwestern Pipeline Compressor Station: Corona
Transwestern Pipeline Compressor Station: Mountainair
Transwestern Pipeline Compressor Station: Laguna
Transwestern Pipeline Compressor Station: Thoreau

These PAs are MSCA commitments. Site Inspections are recommended for all four sites because of the documented presence of PCBs.

As a result of work done to date, particularly the extensive sampling performed by the company's consultant, EID is concerned that serious hazards are present at these sites and that some immediate action may be warranted to protect public health. Particular problems are public access to contaminated areas and offsite transport of contaminants via runoff and erosion.

At each of the four stations there are workers and their families living onsite. From four to eight children are present at each site. Sampling and analytical results summarized in the Woodward-Clyde report of April 1987 indicate that PCBs in excess of 25 ppm occur at all four stations in areas that are accessible to individuals onsite. EPA should evaluate the degree of threat posed to individuals living on site and determine if it is appropriate to immediately and effectively restrict access to areas contaminated with PCBs at all four stations.

The second major problem is offsite transport of PCB contaminated wastes at Corona, Laguna, and Thoreau. PCBs extend at least 800 feet offsite at Corona, but the limit of contamination has not been found. At Thoreau and Laguna, PCBs occur to the facility boundaries, but offsite sampling has not yet been done. Steps should be taken to determine the extent of offsite migration, to limit further migration, and to prevent public access to offsite contamination.

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EID will investigate its available legal options to order the company to take immediate steps to alleviate the public health concerns outlined above. We request that EPA do the same.

Finally, additional sampling is recommended at all four sites, with the ultimate goal of HRS scoring and NPL listing. Although much sampling has been done to date, significant data gaps remain. At the Corona site these gaps include defining contaminant boundaries, horizontally and vertically, and defining extent of offsite transport via runoff. At Mountainair there is little laboratory confirmation of field testing results which proved to be unreliable at other stations. Laboratory analysis of soil samples is needed. The Laguna station requires investigation of vertical extent of contamination, investigation of offsite transport, and definition of contaminant limits onsite. At Thoreau some remedial work has been done to limit offsite transport of PCBs, but sampling is still needed to determine horizontal and vertical extent of contamination onsite and offsite.

EID resources through its MSCA are fully committed through March 31, 1988. Additionally, laboratory resources available to the NMEID are insufficient to handle the extensive load of PCB analyses. With assistance of EPA's Contract Laboratory Program, EID could probably perform Site Inspections after April 1, 1988. If EPA desires more prompt SIs, then we suggest they be tasked to FIT.

Sincerely,

for 

Steven J. Cary, Program Manager
Superfund Section
Ground Water/Hazardous Waste Section
Environmental Improvement Division

Enclosure

cc: JoAnn Miller, 6H-ES, EPA
Jimmy D. Harp, Director, Environmental, Codes & Standards